July 10, 2009

MEMORANDUM TO: Thomas G. Hiltz, Chief
Advanced Fuel Cycle, Enrichment,
and Uranium Conversion Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

FROM: Tilda Y. Liu, Senior Project Manager **/RA/**
Advanced Fuel Cycle, Enrichment,
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Division of Fuel Cycle Safety
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Office of Nuclear Material Safety
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SUBJECT: JUNE 23, 2009, TELEPHONE CONFERENCE SUMMARY ON LICENSE AMENDMENT REQUEST TO MODIFY CONTAMINATION LEVELS, HONEYWELL METROPOLIS WORKS (TAC NO. L32712)

The U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Honeywell Metropolis Works (MTW or the licensee) held a telephone conference on June 23, 2009, to discuss the staff's draft requests for additional information (RAIs) concerning Honeywell MTW's proposed amendment to the Honeywell Source Material License SUB-526, dated March 27, 2009 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML090910146), involving changes to the facility's surface contamination levels. The proposed license application amendment would revise the surface contamination levels for uranium and its daughter products be established in accordance with the guidelines of Regulatory Guide (RG) 8.30, "Health Physics Survey in Uranium Recovery Facilities," Revision 1, as 1,000 disintegrations per minute (dpm)/100 centimeter square (cm^2) (alpha particles) for the Uncontrolled and Intermediate Areas and 110,000 dpm/100cm^2 (alpha particles), which is 50 percent of RG 8.30 limit, for the Controlled Areas of the facility.

By letter dated April 21, 2009 (ADAMS Accession No. ML091030016), the staff provided its RAI regarding this license amendment request. On May 11, 2009 (ADAMS Accession No. ML091340042), the licensee provided its response to the staff's RAI. The staff has reviewed the licensee's May 11, 2009, RAI response, and determined that additional information is needed regarding Honeywell MTW's proposal to increase its contamination control limits. Subsequently, on June 19, 2009, the staff provided additional questions as RAIs to the licensee via e-mail.

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The conference call was useful in clarifying the intent of the staff's draft RAIs. No staff decisions were made during the telephone conference. On the basis of the discussion, Honeywell MTW representatives were able to better understand the staff's concerns. In order to allow the staff to perform a thorough review, Honeywell MTW agreed to provide supplemental information to its March 27, 2009, license amendment request. Therefore, the staff informed the licensee that the draft RAIs, originally transmitted to Honeywell MTW via e-mail on June 19, 2009, will not be sent as formal RAIs, as Honeywell plans to submit supplemental information to its license amendment request dated March 27, 2009.

Enclosure 1 provides a list of those who participated in the telephone conference. Enclosure 2 contains a listing of the draft RAIs that the staff provided to Honeywell MTW, via e-mail, on June 19, 2009, to facilitate the telephone discussion.

Honeywell MTW has had an opportunity to review and comment on this summary.

Docket No.: 40-3392
License No.: SUB-526

Enclosures: As stated

cc w/enclosures:
Mitch Tillman, Plant Manager, Honeywell
Michael Greeno, Acting Nuclear Regulatory Affairs
Manager, Honeywell

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Mitch Tillman, Plant Manager, Honeywell
Michael Greeno, Acting Nuclear Regulatory Affairs
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AFCB r/f J. Henson, RII J. Pelchat, RII G. Chapman, NMSS

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DATE	6/26/09		7/9/09		7/10/09	

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LIST OF PARTICIPANTS FOR TELEPHONE CONFERENCE TO DISCUSS

MARCH 27, 2009, LICENSE AMENDMENT CONCERNING CONTAMINATION LEVELS

HONEYWELL METROPOLIS WORKS

DRAFT REQUESTS FOR ADDITIONAL INFORMATION

June 23, 2009

NAME	AFFILIATION
Greg Chapman	U.S. Nuclear Regulatory Commission (NRC)
Tilda Liu	NRC
Michael Greeno	Honeywell Metropolis Works (MTW)
Robert Stokes	Honeywell MTW
Lidia Litinski	Honeywell MTW

DRAFT REQUEST FOR ADDITIONAL INFORMATION

MARCH 27, 2009, LICENSE AMENDMENT CONCERNING CONTAMINATION LEVELS

HONEYWELL METROPOLIS WORKS

(TAC NO. L32712)

The staff has reviewed Honeywell Metropolis Works' (MTW or the licensee) response (ML091340042), dated May 11, 2009, to the staff's request for additional information, dated April 21, 2009, (ML091030016). The staff is concerned that MTW's proposal to increase its contamination control limits in restricted areas to 220,000 disintegrations per minute (dpm)/100 centimeter square (cm^2) would likely lead to practices that are contrary to the facility's As Low As Reasonable Achievable (ALARA) practice. In addition, application of the contamination guidance in Regulatory Guide (RG) 8.30 may not be appropriate because the radiological and chemical considerations present at Honeywell MTW are different than those at Uranium Recovery facilities for which the guidance was developed. Also, the proposed selective use of RG 8.30 is not consistent with the Uranium Recovery industry practices for contamination control which are already using this guidance.

Specifically, the staff has identified the following issues of concern:

<u>D-RAI 4</u>

The staff finds that there is insufficient information to determine whether the processes at Honeywell are unilaterally consistent with those occurring in the yellowcake drying and packaging areas at Uranium Recovery facilities. These areas are generally the only ones where the 220,000 dpm/100 cm^2 limit is applied at Uranium Recovery facilities. The specific concerns are with regards to the chemical form of materials, process containment, and consideration of worker exposure to Radon progeny. RG 8.30 was developed specifically for the Uranium Recovery industry with consideration given to operating processes, chemical form of uranium, and other radioactive materials inherent to the industry (e.g., Radon progeny and the entire uranium decay chain present in ore dust). The RG states that it may be applied, in part, to portions of conversion facilities since some of the processes used in those facilities are similar to those in Uranium Recovery facilities. Honeywell has indicated that all restricted areas should be unilaterally treated the same as a yellowcake area with regards to contamination control. However, there are different chemical forms of uranium present and the Uranium Recovery facilities also take into consideration the Radon hazard in their monitoring and controls. The licensee is requested to explain how these variances are addressed at the Honeywell MTW facility.

<u>D-RAI 5</u>

Honeywell is requesting to utilize specific aspects of guidance for the Uranium Recovery industry without an equivalent contamination control program as the facilities at which the guidance is directed. If the proposed amendment were to be approved, Honeywell could subsequently adopt its facility practices to be similar to those in place at Uranium Recovery yellowcake drying and packaging areas which is where the 220,000 dpm/100 cm^2 contamination limit is typically applied and where respiratory protection is normally utilized. This may result in a significant increase in respirator usage throughout the restricted areas, which is contrary to

the facility's ALARA practice. This issue is of an elevated concern as there are eating/break areas within the restricted areas. Uranium Recovery facilities also adhere to contamination control program elements that are more stringent than those in RG 8.30, including more frequent surveys, timely clean up of spills, and general controlled area contamination limits which are more conservative than those currently utilized at Honeywell. The licensee is requested to explain how these issues of concern are addressed.

D-RAI 6

The proposed 220,000 dpm/100 cm^2 limit for contamination, established in Regulatory Guide 8.30, is not specifically stated to be a removable activity limit. Guidance such as NUREG-1720 has been used to develop generic contamination guidelines for decommissioning assuming approximately 10 percent of the total contamination present would be transferrable. If similar logic were applied to the proposed contamination limit, it would significantly reduce the applicable smearable contamination limit. The licensee is requested to provide justification for using this limit at Honeywell MTW.

D-RAI 7

The staff noted that the proposed removal of the timeliness commitment for scheduling decontamination will resolve Honeywell's recent challenges in meeting the requirement contained in its materials license. Because the requirement is established for scheduling and does not limit the time frame for which decontamination must occur, the licensee is requested to justify its reasons for the proposed change.